Shorne Parish Council

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SHORNE PARISH COUNCIL (IP ref 20035603)

DfT letter requesting comments, dated 9th July 2024: Response to points 8 and 9 regarding Rest and Service Area provision

Introduction:

Shorne Parish is located immediately north of the A2 and west of Gravesend. It will be very severely impacted by the A122 Lower Thames Crossing (LTC) proposals.

Our full introduction can be found in our Written Representations submitted at the beginning of the DCO process, please see pages 1-2 of Ref REP1-408: TR010032-002949-Shorne Parish Council - Written Representation (WR).pdf (planninginspectorate.gov.uk)

We also covered the topic of the removal of the Cobham south side, westbound services in our previous representations: Section 3 on pages 4-5 of Ref REP2-118: TR010032-003285-DL2 - Shorne Parish Council - Comments on WRs.pdf (planninginspectorate.gov.uk)

We have considered the response of 29th May 2024 by the Applicant to paragraph 2 of the Secretary of State's consultation letter of the 21st May 2024, regarding "Rest and Service Area Provision".

As well as serving Strategic Road Network (SRN) traffic, Cobham services is very highly used and highly valued by local and wider local area residents as the facility is located very soon after joining it, e.g. from the A289 or A228, or turning onto the A2 from nearby villages

when heading westbound. The previous north side, eastbound services were also similarly highly used and valued.

This document provides comments from a local perspective on the Applicant's Appendix A of their response letter that we hope will usefully aid deliberations.

Comments:

Section A.2.1:

- Reference is made to the closure of the north side, eastbound Cobham Rest and Service Area (RASA) in 2008. This occurred during the last widening of this part of the A2 but the reason it remained closed after works were completed, and was subsequently demolished by National Highways, is unclear. The closure was a major loss to the area, local residents regarding the unnecessary permanent closure as evidence of pre-determination by NH as to the future site for an LTC.
- It should also be noted that another previous eastbound service area at the bottom of Swanscombe cutting was also closed by NH, and another westbound garage was also lost on the southern side of the former A2 line at the junction with the A227 at Gravesend Central.
- It is stated that the existing (south side) Cobham RASA is "for westbound traffic only". While that may be true in purely structural terms, in fact HGV's and other eastbound traffic does use the westbound services by means of exiting at Shorne and turning back, then turning back again at Gravesend East after using the services, this looping route adding to traffic at these already busy junctions.

Section A.2.4:

- Referring also to point A.2.12 point d, as far as we are aware, National Highways (NH) are the owners of the land on which the Cobham southside and previous northside services are/were built, therefore they did previously enable service stations in the area.
- As an SRN road safety matter, we would have expected it to be NH's responsibility to indicate where RASA's are required and then to actively facilitate their provision rather than leaving this important matter to chance. The requirements and responsibilities as stated by NH in their response should perhaps be reviewed and improved.

Section A.2.5:

- As discussed also in Section A.2.6 (please see below), in highly congested traffic areas, especially at peak traffic times and as will further result from the increased traffic to be attracted and generated by the LTC, expectation that vehicles can reach the next formal service station 28 miles away in 30 minutes through driving at 70mph seems overly optimistic. The real-world scenarios are challenging enough for petrol/diesel vehicles caught up in jams let alone the poor actual effective range of many electric vehicles.
- NH refer to the small local garage that was left stranded on the former A2 line at Gravesend Central as still being "Tollgate Services" but do not show its location or access routes in their Figure 3. Their implication is that, despite its constrained pump layout and low quantity of rest facilities (but good local supermarket, with some

takeaways), it still plays a major role in providing support to traffic on the current, relocated alignment of the A2, but we do not believe that to be the case.

Tollgate garage (Image from Google Streetview, dated November 2022)

- To reach the garage from the A2 westbound involves negotiating three busy local road network roundabouts. Although signposted, the location of the garage is unclear to non-local drivers. This overall area and the garage itself are not set up for or suitable for use by anything near the large volumes of cars, vans and HGV's that currently use the Cobham services.

Accessing the garage at Gravesend Central from the A2 westbound

- There has been a lot of concern in Kent over "wild parking" of HGV's in unsuitable locations, and losing the Cobham Services will only make this situation worse.
- If the number and type of vehicles currently using the existing Cobham services instead tried to reach and use the small local garage, the additional traffic at Gravesend Central junction would adversely affect congestion with tailing back onto the A2, although we suggest that drivers are less likely to choose to leave the

motorway standard A2 in order to try and find this local garage on the "wrong" side of the road.
- With the advent of the LTC there could be an even greater number of vehicles diverting from the LTC itself and the westbound M2 and A2 lines onto the southern connector road system to try to access this garage, and which would then face a very complicated and confusing route to resume to their originally intended journey.

Sections A.2.6 and A.2.7:

- It would be more realistic to consider the situation of westbound traffic joining the M2 at Junction 4 at Rainham (so being unable to access the referenced Moto services which are to the east and have no bridge provided to routinely enable turning back), including having previously traversed the A278. Similarly, traffic coming from Medway via the A289 and joining the M2/A2 westbound at M2 Junction 1.
- This traffic has already travelled some distance from a garage location in order to reach the SRN, but the next true SRN location of Services with HGV rest areas are presently either 28 miles away at Clacket Lane on the M25 south/westbound, or 24 miles away and north through the Dartford Crossing to Thurrock in Essex. This is considerably further away than the extra 1 to 3 miles that NH have referenced.

Section A2.8.9:

- Lorry parking in the area has been progressively reduced. Previous lorry parking at Pepper Hill south side, for westbound traffic, was lost to the Channel Tunnel Rail Link works, and the NH owned lorry park at Gravesend East (opposite Nells Café so used as a truck stop) for eastbound traffic was closed then later used to build "temporary" (but still there) offices for NH's LTC investigations.

Section A.2.10:

- We were unaware until reading the NH submission document that there was any official lorry parking facility at Swanscombe but that may additionally explain why the already busy roads in that area have become so badly congested with an obviously greater number of HGV's. Having looked for planning permissions, we remain unclear as to the exact location referenced and are unable to establish details of the permanence, design and quality of the offering.
- It is not a suitable location for such a facility as the only access at present (due to the collapse and longstanding closure of Galley Hill Road nearby) is from the A2 and back again past Ebbsfleet International station, via congested areas that are increasingly residential.
- HGV's intending to use the LTC would have to drive an additional 7km westbound on the A2 before turning off then another 7km back again, increasing traffic volume on the A2. But it is more likely that having reached Swanscombe they would instead either use the A226 westbound to reach the Dartford Crossing approach road or return to and continue up the A2 to use the Dartford Crossing and M25 northbound.

Section A.2.12, point a:

- The questions about whether road access across the Thames at and east of the Dartford Crossing can do with improvement and where such improvement should first be made remain controversial topics.
- The Cobham Services are only lost if there should be a new crossing located immediately east of Gravesend making a T-junction with the A2 rather than completing and improving the vital M25 ring-road to motorway standards.

- Many disagree with the Applicant's view that there is a "clear and compelling need" for the A122 Lower Thames Crossing at Gravesend and argue that improvement at the Dartford Crossing (as will be needed anyway) should instead be the priority and that if a new additional crossing is needed it should be located much further east.

Section A.2.12, point b:

- It is obvious that a town of the size of Gravesend needs full and proper connections to the strategic road network and thereby all local and distant destinations, as it has at present.
- The Cobham Services are demolished in NH's plans to ensure that Gravesend East junction still has off-slips from the A2 and M2 lines westbound, which are major and essential existing connections. Due to slip-road removal, local traffic has to be able to link via the new lateral connector road to access the same junctions.
- The paragraph is misleading as the Applicant implies that all these access routes are not essential, and that they are in the plans due to a request from GBC, when neither are the case.
- The only aspect that was, and still is, a matter of discussion were the connections from Gravesend East junction eastbound. In NH's earliest plans, the Gravesend East northside roundabout had only a direct connection to the LTC and not to either the A2 line for the A289 or the M2, both as currently and still needed. As the result of objections, the M2 connection was restored but not (yet) that to the A2/A289 line.
- The proposed direct connection to the LTC itself would be less useful numerically to residents, introduces a variety of new hazards and invites rat running from the A2/M2 line to the LTC through the Gravesend East junction.
- In that regard we would disagree with the Applicant as their proposals clearly do not at present "….provide the connectivity necessary in the area….".

Sections A.2.13 and A.4.1:

- The Applicant states their opinion that that there is no need for a RASA as the LTC "….can operate safely…." without one. This seems unlikely when there is such a long stretch of motorway to be traversed, already 14.4 miles from the referenced Moto Services at Rainham prior to taking the LTC northbound, then as reported by the Applicant, there will not be any services until reaching the M25 between junctions 27 and 28, which is another 30 or more miles of driving, 45 miles in total.

Section A.3:

- Opinion generally is that the Tilbury Rest and Service Area was, like the direct link road from the LTC to the Ports and the A229 Bluebell Hill improvements, largely removed from the LTC proposals in order to artificially reduce the costs of the scheme, so as to increase the BCR, which is nevertheless still pretty poor and worsening.

Thank you for considering these representations. We will be happy to answer any further questions or provide any additional information that might be requested.

Planning and Highways Committee, *23rd July 2024*
Shorne Parish Council